

Declaration of Paula Dearolf in Support of Notice of Removal of Team Health, Holdings

Paula Dearolf, being first duly sworn, hereby deposes and says:

1. I, Paula Dearolf, am Executive Vice President, Revenue Cycle Operations, for the family of affiliated companies operating under the brand name TeamHealth. I am an employee of HCFS Health Care Financial Services, LLC. I have served in this position since 1994. As such, I have personal knowledge of the matters set out below.

2. I have reviewed the complaint filed by Atlanta Heart Associates in the Henry County Superior Court. I understand that Atlanta Heart Associates seeks to recover certain collections received by InPhyNet Contracting Services, LLC, a TeamHealth-affiliated practice group staffing the emergency department at Piedmont Henry Hospital, Inc. since 2019. Complaint ¶¶ 13, 18, 26, 34.

3. I have directed my staff to run a report from the accounting system to determine the total amount collected for EKG billings from the Piedmont Henry Hospital Emergency Department since January 1, 2019. That report indicates that the amount billed and received for EKGs since January 1, 2019, exceeds \$175,000. This amount is for EKGs read for emergency department patients by emergency medicine specialists providing care to those patients.

4. Thus, based on the books and records regularly maintained on behalf of InPhyNet Contracting Service, LCC, the amount in controversy in this action is in excess of \$75,000.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed on September 15, 2021.

9/15/2021 | 8:06 PM EDT

DocuSigned by:

Paula Dearolf

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Paula Dearolf